

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

PHILOS JEONG

vs.

Case No.: 22-cv-1290

KIA AMERICA, INC., HYUNDAI AMERICA

**MOTION FOR ADMISSION PRO HAC VICE**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Raphael Janove, applicant herein, and  
moves this Court to grant admission to the United States District Court for the Western District of  
Texas pro hac vice to represent Plaintiff in this case, and  
would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm (or practices under the name of)  
Pollock Cohen LLP with offices at:  
Mailing address: 1617 John F. Kennedy Blvd., 20th Floor  
City, State, Zip Code: Philadelphia, PA, 19103  
Telephone: (215) 667-8607 Facsimile: (347) 696-1227
2. Since 12/8/2014, Applicant has been and presently is a  
member of and in good standing with the Bar of the State of New York.  
Applicant's bar license number is 5302443.
3. Applicant has been admitted to practice before the following courts:

Court:	Admission date:
<u>U.S. District Court, E.D.N.Y.</u>	<u>January 3, 2015</u>
<u>U.S. District Court, S.D.N.Y.</u>	<u>January 30, 2015</u>
<u>U.S. District Court, N.D. Ill.</u>	<u>December 17, 2018</u>

4. Applicant is presently a member in good standing of the bars of the courts listed above, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):

NA

5. I ☐ have ☒ have not previously applied to Appear Pro Hac Vice in this district court in Case[s]:

Number: \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Number: \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Number: \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

6. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided:

NA

7. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):

NA

8. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

9. Applicant will file an Application for Admission to Practice before the United States District Court for the Western District of Texas, if so requested; or Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Co-counsel: Max Rodriguez, Pollock Cohen LLP

Mailing address: 111 Broadway, Suite 1804

City, State, Zip Code: New York, NY 10006

Telephone: (212) 337-5361

Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 pro hac vice fee in compliance with Local Court Rule AT-1(f)(2) [checks made payable to: Clerk, U.S. District Court].

Wherefore, Applicant prays that this Court enter an order permitting the admission of Raphael Janove to the Western District of Texas pro hac vice for this case only.

Respectfully submitted,

Raphael Janove

[printed name of Applicant]



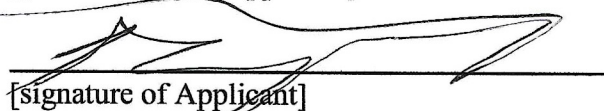
[signature of Applicant]

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 2 day of December, 2022.

Raphael Janove

[printed name of Applicant]



[signature of Applicant]

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**ORDER**

BE IT REMEMBERED on this day, there was presented to the Court the Motion for Admission Pro Hac Vice filed by Raphael Janove, counsel for Plaintiff \_\_\_\_\_, and the Court, having reviewed the motion, enters the following order:

IT IS ORDERED that the Motion for Admission Pro Hac Vice is GRANTED, and Raphael Janove may appear on behalf of Plaintiff \_\_\_\_\_ in the above case.

IT IS FURTHER ORDERED that Raphael Janove, if he/she has not already done so, shall immediately tender the amount of \$100.00, made payable to: **Clerk, U.S. District Court**, in compliance with Local Court Rule AT-1(f)(2).

SIGNED this the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd day of December, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing only to myself.

I hereby certify that I have caused the document to be sent by electronic mail to the following non-CM/ECF counsel representing the defendants:

Peter J. Brennan  
JENNER & BLOCK LLP  
353 North Clark Street  
Chicago, IL 60654-3456  
Telephone: +1 312 222 9350  
Facsimile: +1 312 527 0484  
email: [pbrennan@jenner.com](mailto:pbrennan@jenner.com)

/s/ Max Rodriguez  
Max Rodriguez